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Google Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

THE AUTHORS GUILD, INC., Associational Plaintiff, BETTY MILES, JOSEPH GOULDEN, and JIM BOUTON, on behalf of themselves and all other similarly situated, Plaintiffs, v. GOOGLE INC., Defendant.	Civil Action No. 05 CV 8136 (DC) **ECF Case**

DECLARATION OF STEPHANE JASKIEWICZ SUPPORT OF DEFENDANT GOOGLE INC.'S MOTION FOR SUMMARY JUDGMENT

I, Stephane Jaskiewicz, hereby declare under penalty of perjury:

1.   I am an Engineer at Google Inc. I submit this declaration in support of Defendant's Motion for Summary Judgment. I make this declaration based on personal knowledge of the facts and circumstances set forth herein.

I.   THE GOOGLE BOOKS CORPUS

2.   I am familiar with the technical process which scanned books undergo, and am familiar with the databases which hold information about the books in the Google Books corpus.

3.   Books are scanned at scan centers. Images of the book pages are stored in a secure manner for processing. Optical character recognition (OCR) is performed on the images to generate machine-readable text, which is also stored on Google file servers.

4.   I am generally familiar with the scope of the books which can be searched through Google Books. The Google Books corpus contains virtually every type of book: novels, biographies, children's picture books, reference works, textbooks, instruction manuals, treatises, dictionaries, cookbooks, books of poetry and memoirs. Google Books includes both in print and out of print works, though the significant majority are out of print.

5.   Google has a policy of excluding from display works a rightsholder has asked Google not to display and takes steps to render the text of those books unsearchable. Any rightsholder can exclude a book simply by filling out an online form which was been available since 2005. Google maintains a database of books which are to be excluded as a result of requests from rightsholders.

II.   THE GRIN SYSTEM

6.   A library that has submitted a book to be scanned may make and download a copy of the scan of its book using a system called the Google Return Interface (GRIN).

7.   I lead the engineering team responsible for maintaining GRIN, and am familiar

with its operation. The details of GRIN discussed herein have not varied over time.

8.   To make this copy, a library first submits a request to the GRIN system, which in turn triggers the creation of an encrypted copy of the book that is placed on a secure Google server. This copy is made from the central copy of the scan data stored by Google, which is used by the processes which support other portions of Google Books, such as indexing and snippet display. Each book is encrypted, and each library has a unique encryption key. The library may then download this encrypted copy of the book it made.

9.   Some but not all full-length English-language books not known to be in the public domain have been copied by the libraries using GRIN. Where a library takes no action with respect to a particular book, the GRIN system does not do anything with respect to that book.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this **25** day of July, 2012 at Mountain View, California.

Stephane Jaskiewicz